

JS 44 (Rev. 12/07, NJ 5/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

LARRY BRADFORD

(b) County of Residence of First Listed Plaintiff _____

(c) Attorney's (Firm Name, Address, Telephone Number and Email Address)

Craig Thor Kimmel, Esquire
Kimmel & Silverman, P.C.
30 E. Butler Pike
Ambler, PA 19002
(215) 540-8888

DEFENDANTS

NCO FINANCIAL SYSTEMS, INC.

County of Residence of First Listed Defendant _____

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known) _____

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. SECTION 1692
Brief description of cause:
Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S)**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

Explanation:

3-11-11

DATE

SIGNATURE OF ATTORNEY OF RECORD

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 3573 Armstrong Road, Summersville, WV 26651

Address of Defendant: 507 Prudential Road, Horsham, PA 19044

Place of Accident, Incident or Transaction: _____
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases 15 U.S.C. § 11092
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Craig Thor-Kimmel, counsel of record do hereby certify:
☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
☐ Relief other than monetary damages is sought.

DATE: 3-11-11 Craig Thor-Kimmel 57100
 Attorney-at-Law Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 3-11-11 Craig Thor-Kimmel 57100
 Attorney-at-Law Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Larry Bradford

CIVIL ACTION

v.

NCO Financial Systems, Inc.

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

3-11-11
Date

Craig Thor Kimmel
Attorney-at-law

Larry Bradford
Attorney for

215-540-8888
Telephone

877-788-2864
FAX Number

Kimmel@creditlaw.com
E-Mail Address

1
2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

4 LARRY BRADFORD,

5 Plaintiff

7 v.

8 NCO FINANCIAL SYSTEMS, INC.,

9 Defendant

)

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)

)

)

)

)

Case No.:

**COMPLAINT AND DEMAND FOR
JURY TRIAL**

(Unlawful Debt Collection Practices)

11 **COMPLAINT**

12
13 LARRY BRADFORD ("Plaintiff"), by his attorneys, KIMMEL &
14 SILVERMAN, P.C., alleges the following against NCO FINANCIAL SYSTEMS,
15 INC., ("Defendant"):

17 **INTRODUCTION**

18 1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection
19 Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").

21 **JURISDICTION AND VENUE**

22 2. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d),
23 which states that such actions may be brought and heard before "any appropriate
24 United States district court without regard to the amount in controversy," and 28
25

1 U.S.C. § 1331 grants this court original jurisdiction of all civil actions arising
2 under the laws of the United States.

3
4 3. Defendant conducts business and has an office in the Commonwealth
5 of Pennsylvania, and therefore, personal jurisdiction is established.

6 4. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).

7
8 5. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and
9 2202.

10 **PARTIES**

11 6. Plaintiff is a natural person residing in the city of Summersville, West
12 Virginia.

13
14 7. Plaintiff is a "consumer" as that term is defined by 15 U.S.C. §
15 1692a(3).

16
17 8. Defendant is a national debt collection company with its corporate
18 headquarters located at 507 Prudential Road, Horsham, Pennsylvania, 19044-
19 2308.

20 9. Defendant is a debt collector as that term is defined by 15 U.S.C. §
21 1692a(6), and sought to collect a consumer debt from Plaintiff.

22
23 10. Defendant acted through its agents, employees, officers, members,
24 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,
25 representatives, and insurers.

PRELIMINARY STATEMENT

11. The Fair Debt Collection Practices Act ("FDCPA") is a comprehensive statute, which prohibits a catalog of activities in connection with the collection of debts by third parties. See 15 U.S.C. § 1692 *et seq.* The FDCPA imposes civil liability on any person or entity that violates its provisions, and establishes general standards of debt collector conduct, defines abuse, and provides for specific consumer rights. 15 U.S.C. § 1692k. The operative provisions of the FDCPA declare certain rights to be provided to or claimed by debtors, forbid deceitful and misleading practices, prohibit harassing and abusive tactics, and proscribe unfair or unconscionable conduct, both generally and in a specific list of disapproved practices.

12. In particular, the FDCPA broadly enumerates several practices considered contrary to its stated purpose, and forbids debt collectors from taking such action. The substantive heart of the FDCPA lies in three broad prohibitions. First, a "debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt." 15 U.S.C. § 1692d. Second, a "debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt." 15 U.S.C. § 1692e. And third, a "debt collector may not use unfair or unconscionable means to collect or attempt to collect any debt." 15 U.S.C. §

1 1692f. The FDCPA is designed to protect consumers from unscrupulous
2 collectors, whether or not there exists a valid debt, broadly prohibits unfair or
3 unconscionable collection methods, conduct which harasses, oppresses or abuses
4 any debtor, and any false, deceptive or misleading statements in connection with
5 the collection of a debt.
6

7 13. In enacting the FDCPA, the United States Congress found that
8 “[t]here is abundant evidence of the use of abusive, deceptive, and unfair debt
9 collection practices by many debt collectors,” which “contribute to the number of
10 personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of
11 individual privacy.” 15 U.S.C. § 1692a. Congress additionally found existing
12 laws and procedures for redressing debt collection injuries to be inadequate to
13 protect consumers. 15 U.S.C. § 1692b.
14

15 14. Congress enacted the FDCPA to regulate the collection of consumer
16 debts by debt collectors. The express purposes of the FDCPA are to “eliminate
17 abusive debt collection practices by debt collectors, to insure that debt collectors
18 who refrain from using abusive debt collection practices are not competitively
19 disadvantaged, and to promote consistent State action to protect consumers against
20 debt collection abuses.” 15 U.S.C. § 1692e.
21
22
23

24 **FACTUAL ALLEGATIONS**

25 15. At all pertinent times hereto, Defendant was attempting to collect a

1 consumer debt allegedly owed by Plaintiff.

2 16. The alleged debt at issue arose out of transactions, which were
3 primarily for personal, family, or household purposes.
4

5 17. Defendant deceptively attempted to collect on an account that had
6 been paid in full.

7 18. Specifically, on or about March 2, 2010, EarthLink sent Plaintiff a
8 letter notifying him that his EarthLink account had a past due balance of \$43.90.
9
10 See Exhibit A, Letter from EarthLink.

11 19. Thereafter, on or about March 12, 2010, Plaintiff sent a check, in the
12 amount of \$43.90, to EarthLink to pay the outstanding balance. See Exhibit B,
13 Plaintiff's check.
14

15 20. Plaintiff owed no other money to EarthLink.

16 21. Then, on or about January 26, 2011, Defendant sent Plaintiff a
17 collection letter seeking and demanding payment of \$67.54 for a past due balance
18 allegedly owed to EarthLink, which Plaintiff had already paid in full in March
19 2010. See Exhibit C, Defendant's January 26, 2011, letter.
20

21 22. Further, Defendant threatened Plaintiff that if he did not respond its
22 letter, Defendant would "assign [his] account to a collector with instructions to
23 collect the balance." See Exhibit C.
24

25 23. Plaintiff disputes owing any debt to Earthlink.

1 24. Upon information and belief, Defendant was seeking to collect a debt
2 from Plaintiff that he did not owe.

3
4 25. Defendant conducted its collection activities in ways that were
5 factually misrepresented and in violation of the FDCPA.

6 **CONSTRUCTION OF APPLICABLE LAW**

7 26. The FDCPA is a strict liability statute. Taylor v. Perrin, Landry,
8 deLaunay & Durand, 103 F.3d 1232 (5th Cir. 1997). “Because the Act imposes
9 strict liability, a consumer need not show intentional conduct by the debt collector
10 to be entitled to damages.” Russell v. Equifax A.R.S., 74 F. 3d 30 (2d Cir. 1996);
11 see also Gearing v. Check Brokerage Corp., 233 F.3d 469 (7th Cir. 2000) (holding
12 unintentional misrepresentation of debt collector’s legal status violated FDCPA);
13 Clomon v. Jackson, 988 F. 2d 1314 (2d Cir. 1993).

14
15 27. The FDCPA is a remedial statute, and therefore must be construed
16 liberally in favor of the debtor. Sprinkle v. SB&C Ltd., 472 F. Supp. 2d 1235
17 (W.D. Wash. 2006). The remedial nature of the FDCPA requires that courts
18 interpret it liberally. Clark v. Capital Credit & Collection Services, Inc., 460 F. 3d
19 1162 (9th Cir. 2006). “Because the FDCPA, like the Truth in Lending Act (TILA)
20 15 U.S.C §1601 *et seq.*, is a remedial statute, it should be construed liberally in
21 favor of the consumer.” Johnson v. Riddle, 305 F. 3d 1107 (10th Cir. 2002).
22
23
24
25

1 28. The FDCPA is to be interpreted in accordance with the “least
2 sophisticated” consumer standard. See Jeter v. Credit Bureau, Inc., 760 F.2d 1168
3 (11th Cir. 1985); Graziano v. Harrison, 950 F. 2d 107 (3rd Cir. 1991); Swanson v.
4 Southern Oregon Credit Service, Inc., 869 F.2d 1222 (9th Cir. 1988). The FDCPA
5 was not “made for the protection of experts, but for the public - that vast multitude
6 which includes the ignorant, the unthinking, and the credulous, and the fact that a
7 false statement may be obviously false to those who are trained and experienced
8 does not change its character, nor take away its power to deceive others less
9 experienced.” Id. The least sophisticated consumer standard serves a dual
10 purpose in that it ensures protection of all consumers, even naive and trusting,
11 against deceptive collection practices, and protects collectors against liability for
12 bizarre or idiosyncratic interpretations of collection notices. Clomon, 988 F. 2d at
13 1318.

14
15
16
17
18 **COUNT I**
19 **DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES**
20 **ACT**

21 29. Defendant violated the FDCPA based on the following:

- 22 a. Defendant violated §1692 of the FDCPA generally;
23 b. Defendant violated §1692d of the FDCPA by engaging in
24 conduct the natural consequence of which is to harass, oppress,
25 or abuse the Plaintiff in connection with the collection of a
 debt;

- c. Defendant violated §1692e of the FDCPA by using false, deceptive and misleading representations in connection with the collection of a debt;
- d. Defendant violated §1692e(2) of the FDCPA by falsely representing the character, amount, or legal status of any debt;
- e. Defendant violated §1692e(10) of the FDCPA by using false and deceptive means to collect or attempt to collect a debt; and
- f. Defendant violated §1692f of the FDCPA by using unfair or unconscionable means to collect or attempt to collect any debt.

30. As a direct and proximate result of one or more or all of the statutory violations above, Plaintiff has suffered emotional distress.

WHEREFORE, Plaintiff, LARRY BRADFORD, respectfully requests judgment be entered against Defendant, NCO FINANCIAL SYSTEMS, INC., for the following:

- a. Declaratory judgment that Defendant's conduct violated the Fair Debt Collection Practices Act,
- b. Statutory damages pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k,
- c. Actual damages,
- d. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k
- e. Any other relief that this Honorable Court deems appropriate.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, LARRY BRADFORD, demands a jury trial in this case.

DATED: 3-11-11

RESPECTFULLY SUBMITTED,

KIMMEL & SILVERMAN, P.C.

By: 

Craig Thor Kimmel

Attorney ID # 57100

Kimmel & Silverman, P.C.

30 E. Butler Pike

Ambler, PA 19002

Phone: (215) 540-8888

Fax: (877) 788-2864

Email: kimmel@creditlaw.com

EarthLink Customer Service
PO Box 7645
Atlanta, GA 30357-7645
(888) EARTHLINK M-F 7am-12am EST
<http://myaccount.earthlink.net>

Date: March 02, 2010
Account Number: 26589015
Balance Due: \$43.90

pd, 3-12-10
\$43.90

FINAL NOTICE

March 02, 2010

Dear Larry Allen Bradford,

We're writing to let you know that your EarthLink account #26589015 with a balance of \$43.90 was past due as of March 02, 2010.

If we do not receive payment, your account will be deactivated and we may begin with collections. To reactivate your account, you will be required to pay a \$15 reactivation fee.

Please remit payment immediately to avoid an interruption to your service. If you recently made this payment, there is nothing you need to do.

To make a one-time payment, please do one of the following:

Online: Go to My Account: myaccount.earthlink.net
Once there, click on "Billing Information," then "Make Online Credit Card Payment."

Automated Phone: Call 1-888-EarthLink and tell the system you'd like to pay your bill.

Postal Mail: Send a check or money order (account number included) to:
EarthLink, Inc. PO BOX 790216, ST LOUIS, MO 63179-0216

Need help? You'll find answers to frequently asked billing questions at:
www.earthlink.net/support/invoicfaq

We appreciate your prompt attention to this matter.

Sincerely,

EarthLink Support

EarthLink

"You may choose this credit card as your monthly recurring payment when you make a one time payment. Just click the box to "set up that card for recurring charges."

Not recording for your records



LARRY BRADFORD
CAROL L. BRADFORD

1711

DATE 3-12-10

Pay to the order of Earth Link 1543.90

Forty-Three + $\frac{9}{100}$

Community Trust Bank

2688715 Carol L. Bradford

Check 1711 3/18/2010 Amount \$43.90



PO BOX 15630
DEPT 02
WILMINGTON, DE 19850

NCO FINANCIAL SYSTEMS, INC.

507 Prudential Road, Horsham, PA 19044

Calls to or from this company may be monitored
or recorded for quality assurance.

800-709-8625
OFFICE HOURS:
8AM-9PM MON THRU THURSDAY
8AM-5PM FRIDAY
8AM-12PM SATURDAY
Jan 26, 2011

9380-687
HJZ834
LARRY ALLE BRADFORD
3573 ARMSTRONG RD
SUMMERSVILLE WV 26651-9817

CREDITOR: EARTHLINK
CREDITOR'S ACCOUNT #: 26589015
REGARDING: PAST DUE BALANCE
CURRENT BALANCE DUE: \$67.54

The named creditor has placed this account with our office for collection. It is important that you forward payment in full.

If you choose not to respond to this notification, we will assign your account to a collector with instructions to collect the balance.

To assure proper credit, please put our internal account number HJZ834 on your check or money order and enclose the lower portion of this letter, or a copy thereof, with your payment. If you need to speak to a representative, contact us at 800-709-8625.

Returned checks may be subject to the maximum fees allowed by your state.

You may also make payment by visiting us online at www.ncofinancial.com. Your unique registration code is CHJZ8340-2B3RT6. To receive future notices for the account(s) by e-mail, visit www.ncofinancial.com for details.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Your account balance may be periodically increased due to the addition of accrued interest or other charges as provided in your agreement with the original creditor or as otherwise provided by state law.

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This is a communication from a debt collector.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT (MAKE SURE ADDRESS SHOWS THROUGH WINDOW)

Our Account #	Current Balance Due
HJZ834	\$ 67.54

LARRY ALLE BRADFORD
Payment Amount

\$

Check here if your address or phone number has
changed and provide the new information below.

Mail Payment To:

|||||
NCO FINANCIAL SYSTEMS
PO BOX 15372
WILMINGTON, DE 19850-5372

NCOP D7
687

010200HJZ8349000000320000000000067543

